

COPY

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

**JOURDEAN LORAH**

**Plaintiff**

**Civil Action N. 06-CV-00538**

**v.**

**TETRA TECH, INC.**

**Defendant**

**RESPONSE TO DEFENDANTS MOTION**

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2008 FEB -5 PM 12:13

Plaintiff, Jourdean Lorah objects to the Defendants request to dismiss the complaint. Plaintiff, Jourdean has stated her case and she has provided the Defendant's attorney with documents that support her case. The following statements concerning the Plaintiff's argument is regarding her gender, age and disability (Title VII -discrimination).

1. Upon interview, Plaintiff, Jourdean Lorah was told by Mr. John Traynor of Tetra Tech that he could not directly hire the Plaintiff, Jourdean Lorah. Mr. John Traynor suggested an agency for placement. During the Plaintiff's interview, Mr. Traynor asked the Plaintiff, if she had any disabilities. Plaintiff, told Mr. John Traynor what her disability was.
2. Approximately, one month after the Plaintiff, Jourdean was hired through Synerfac to work at Tetra Tech, a younger female employee was hired. The younger

*Jourdean Lorah*

colleague was paid more per hour than the Plaintiff.

3. Plaintiff, Jourdean Lorah has approximately sixteen years of professional experience working with various professionals in different industries. Plaintiff, has close to two years of surveying experience working both in the field and drafting the surveys. This experience includes many contracts with architects and engineers on various projects both commercial and residential. Many contracts consisted of space planning, drafting of plans, selection of materials etc. Plaintiff, has a portfolio which is used as a visual for interviews and clients. The portfolio contains plans, drawings, renderings, and surveys.

4. The Defendant argues whether or not the employer is Tetra Tech Inc. or Synerfac. Plaintiff, Jourdean Lorah worked at a computer station at Tetra Tech Inc. and her paycheck was paid by Tetra Tech through Synerfac. The Plaintiff completed each day a Tetra Tech work log which outlined her work on each project.

5. Plaintiff, Jourdean Lorah was never given her six months of training at Tetra Tech when she was employed at Tetra Tech through Synerfac. All of her male colleagues who were younger and who were also working through various agencies received six months of training. The male colleagues were also hired after six months of training directly through Tetra Tech from each agency.

6. Plaintiff, Jourdean Lorah has stated that her male colleagues and a female colleague was younger. All of the Plaintiff's younger colleagues received their training. The Plaintiff did not receive her training and she was harassed incessantly by her younger colleagues. The younger colleagues often stood in the doorways of the office discussing issues of privacy regarding the Plaintiff or defamatory

statements were communicated concerning the Plaintiff's disability. Unlawful assemblage *Cole v. Arkansas*, 333 Ark. 387, 216 S.W. 2d. 402 states that it is unlawful for any person or persons to assemble at an entry/exit, or near a place where a labor dispute exists using threats or force, thus preventing a person from a vocational activity/employment. The age discrimination has been stated and established. The younger colleagues of Tetra Tech are still employed with benefits and retirement. Plaintiff, Jourdean is presently working as a caregiver/maid which pays her much less per hour. Plaintiff's present employment/or hourly pay does not commensurate with her skill. There is no full time employment.

7. The Department of Labor has not provided an administrative remedy for the Title VII discrimination regarding the continuing violation. Plaintiff has not been paid for her services of laundry for the month of December 2007. The Plaintiff, Jourdean is entitled to the relief or the settlement out of court. Tetra Tech Inc., violated the Plaintiff, Jourdean by way of Title VII discrimination.

8. The damages regarding the Plaintiff has resulted in slander. The employment contract at Tetra Tech Inc. was discussed by the younger colleagues as if the Plaintiff's contract was a marriage contract. Plaintiff, was told by her supervisor that her contract was ending but it was not because of her job performance. The employees referred to the Plaintiff 's contract as a divorce. The Plaintiff, is not married nor is she engaged. The sealed document is proof that the Plaintiff has been violated concerning proprietary provisions. 9. Plaintiff, Jourdean Lorah is presently without retirement, no benefits and is still on welfare. Plaintiff must seek charity to pay her bills. Plaintiff, Jourdean Lorah is not unintelligent nor is she retarded.

**Plaintiff has a degree in Science and is completing her second degree in Liberal Arts. Presently, there are no job offers that have been offered to the Plaintiff that would commensurate her skill. Plaintiff, has applied to various companies and has followed up on each application. 10. Plaintiff, prays respectively for an administrative remedy through either The Department of Labor and or The United States District Court For the State of Delaware. All officials, administrators, intake investigators etc. were notified. Plaintiff, requested her to sue. Turnbill v. Fink , 668 A 2d. 1370 (Del.1995). Plaintiff, can be compensated/settlement when the agents and the officials knew that the Plaintiff's rights were being violated. 11. Plaintiff, Jourdean has proved her claim against Tetra Tech Inc. regarding Title VII discrimination. Younger colleagues received training, benefits and retirement. Plaintiff, was also asked to get up from her computer workstation to be replaced by a younger male colleague. The younger male colleague remained employed. Defendant's attorney consistently argues FRAP. Tetra Tech Inc. violated the rules under Federal law of Title VII (age, gender and disability). The Plaintiff is financially unable to afford an attorney as a result of the company's violations of discrimination.**

**STATEMENT OF FACTS**

**Division of Social Services ..... 1.**  
**Letter Concerning Food Stamps**

**Catholic Charities ..... 2.**  
**Letter Regarding Charity For Energy Assistance**

**Department of Natural Resources ..... 3.**  
**Environmental Control/PMA Management**

**Disability Letter ..... 4.**

**Medical Lab Reports ..... 5.**

**Tetra Tech Work Log ..... 6.**

## NOTICE TO APPROVE YOUR FOOD STAMPS

STATE OF DELAWARE  
DIVISION OF SOCIAL SERVICES  
JANUARY 04, 2008

TO: JOURDEAN S LORAH

114 WALLS AVE  
WILMINGTON DE 19805

0110 I. HERNANDEZ-ORTIZ  
1715 W 4TH ST  
4TH ST. OFFICE  
WILMINGTON DE 19805

PHONE: (302) 577-3600  
FAX : (302) 577-3648  
CASE : 9001440499 FS 01

Your application for Food Stamps is approved. You will get Food Stamps from DECEMBER 01, 2007 to MAY 31, 2008. Beginning DECEMBER, your monthly Food Stamps benefit will be \$ 162.00.

The following people will get FOOD STAMPS:  
JOURDEAN S LORAH

To use your Food Stamps, you must have an Electronic Benefit Transfer (EBT) card and a Personal Identification Number (PIN).

You can get an EBT card at one of the EBT Issuance Sites. You will need to prove who you are. Take identification such as a driver's license, Medicaid card, State ID or this Food Stamp Approval notice.

## EBT Card Issuance Sites:

Northeast State Ser. Center	1624 Jessup St, Wilm., DE 19802	8:00am-4:30
Porter State Ser. Center	509 W. 8th St, Wilm., DE 19801	8:00am-4:30
DeLaWarr State Ser. Center	500 Rogers Rd, N.C., DE 19720	8:00am-4:30
Hudson State Ser. Center	501 Ogletown Rd, Newark, DE 19711	8:00am-4:30
Williams State Ser. Center	805 River RD, Dover, DE 19901	8:00am-4:30
Milford S.S.C.-Annex	13 SW Front St, Milford, DE 19963	8:00am-4:30
Laurel State Ser. Center	440 N. Poplar St, Laurel, DE 19956	8:00am-4:30
Georgetown S.S.C.	546 Bedford St, Georgetown, DE 19947	8:00am

SIMPLIFIED REQUIREMENTS FOR FOOD STAMP HOUSEHOLDS  
(Elderly or disabled with no earned income.)

The only change you are required to report is a change in the total gross monthly food stamp household income when that total income is greater than the amounts listed below. Any adult living in a home without any minor children and getting food stamps because of working over 20 hours a week must also report when the hours reduce to less than 20 hours per week. You are not required to report other changes in your food stamp household's circumstances.

If your gross income is more than what is listed below for your family size when you last applied, you need to report the change to your worker.

\*\*\*\*\*



Catholic Charities, Inc  
Fourth St. & Greenhill Ave.  
PO Box 2610 Wilmington, DE 19805  
Phone: 654-9295

Client No: 00028677 Date: 01/31/08  
Tel: 302 225 0540 Acct: 3425 2269 9970

JOURDEAN LORAH  
114 WALLS LANE  
WILMINGTON, DE 19805

LIHEAP 2007-08 CLIENT ELIGIBILITY NOTIFICATION

Dear JOURDEAN LORAH,

Your application to the 2007-08 Energy Assistance Program has been approved. Your household may receive assistance up to a total of \$410.00 .

DELMARVA POWER will receive the entire benefit in one payment. It may take up to 60 days before your benefit appears on your account. This may create a credit status until your monthly bills equal or exceed your benefits.

Benefits may be utilized through 04/30/08 . Benefit balances after 04/30/08 will be returned to Catholic Charities.

Please notify us immediately of any address change. Delay in notifying us may result in delay of benefit payment.

YOUR RIGHT TO A FAIR HEARING

- (1) You have a right to appeal and to be heard in a fair hearing if you are dissatisfied with this action.
- (2) In order to receive a fair hearing, a written request is required within 10 days from the date of this notice. The request should be addressed to the fair hearing administrator at the above address.
- (3) You may be represented by legal counsel or other persons of your choice at the fair hearing.

Funded by the United States Department of Health and Human Services through the Delaware Department of Health and Social Services, Division of State Service Centers  
Office of Community Services (HHS/DHSS/DSSC/OCS)

Compensation  
9-8902  
00

STATE OF DELAWARE  
FIRST REPORT  
OF  
OCCUPATIONAL INJURY OR DISEASE

40-0600-210  
LOCATION/DEPT

299400-76-21-40-2  
INSURANCE POLICY NUMBER

1. EMPLOYEE: FIRST MIDDLE LAST Jordan Lorah			2. EMPLOYEE SOCIAL SECURITY NO. 6601	
3. ADDRESS - INCLUDE COUNTY AND ZIP CODE Route 5 Box 150, 318 Frankford, DE 19945, Sussex Co.			4. MALE <input checked="" type="checkbox"/> FEMALE <input type="checkbox"/>	5. EMPLOYEE TELEPHONE NUMBER (302) - 539 - 4773
6. DATE OF BIRTH 1984	7. AGE 18	8. WAGE \$ 9.50 per hour		9. WEEKLY HOURS WORKED 40
10. OCCUPATION (REGULAR) Lifeguard		11. DIVISION REGULARLY EMPLOYED DNREC/Parks & Recreation		12. HOW LONG EMPLOYED 2 years (seasonal)
13. EMPLOYER DEPT. OF NAURAL RESOURCES & ENVIRONMENTAL CONRTOL			14. PERSON MAKING OUT THIS REPORT Bonnie Korstange	
15. ADDRESS - INCLUDE COUNTY AND ZIP CODE 89 Kings Highway, Kent County, DE 19901			16. EMPLOYER TELEPHONE NUMBER (302) - 739-5823	
17. MAILING ADDRESS - IF DIFFERENT FROM ABOVE N/A			18. NATURE OF BUSINESS STATE GOVERNMENT	
19. DATE OF REPORT 06/30/2003	19. DATE OF INJURY AND TIME 06/29/2003 4:30 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	21. NORMAL STARTING TIME 9:00 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	22. IF EMPLOYEE BACK TO WORK GIVE DATE 06/30/2003	23. AT SAME WAGE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
24. IF FATAL INJURY, GIVE DATE OF DEATH / /		24. DATE EMPLOYER KNEW OF INJURY 06/30/2003	26. DATE DISABILITY BEGAN / /	27. LAST FULL DAY PAID - DATE / /
28. DESCRIBE THE INJURY/ILLNESS AND PART OF BODY AFFECTED. Injured right hand				
29. SPECIFY THE DEPARTMENT WHERE INCIDENT OCCURRED AND THE WORK PROCESS INVOLVED. Cape Henlopen State Park				
30. LIST THE EQUIPMENT, MATERIALS, AND CHEMICALS EMPLOYEE WAS USING WHEN THE INCIDENT OCCURRED, E.G. ACETYLENE. None				
31. DESCRIBE THE EMPLOYEE'S ACTIVITY AT THE TIME OF INJURY OR ILLNESS, I.E. Working out - diving into water				
32. DESCRIBE HOW THE INJURY/ILLNESS OCCURRED. While diving into water, employee jammed right hand into sand.				
33. NAME OF PHYSICIAN None listed at this time			34. PHYSICIAN'S ADDRESS	
35. HOSPITAL (IF APPLICABLE)			36. HOSPITAL ADDRESS	
WORKER'S COMPENSATION INSURANCE COMPAYN AND COMPLETE ADDRESS (PREPRINT OR STAMP INCLUDE IAB CODE)				
37. (THIS SECTION MUST BE COMPLETED IN ORDER TO PROCESS)				
PMA MANAGEMENT CORP. P.O. BOX 25248 LEHIGH VALLEY, PA 18002			I.A.B. CODE 40	POLICY NO. 7621402

*Bonnie Korstange* 7/8/03  
SIGNATURE OF PERSON IN 14 ABOVE

*H.R. Technician*  
OFFICIAL POSITION



**Health Care Associates, P.A.**

Jane Govatos, MSN, FNP-C  
Family Nurse Practitioner

Paul E. Gorrin, M.D.  
Internal Medicine  
Allergy

Margaret C. Gatti, MSN, FNP-C  
Family Nurse Practitioner

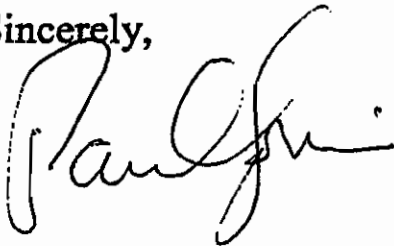
January 21, 2004

To Whom It May Concern,

Jourdean Lorah has allergic rhinitis and asthma. She is medically stable. She does not have an infectious illness and consequently is not a risk for any other person.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Gorrin".

Paul E. Gorrin, M.D.

DATE/TIME DRAWN: 2/4/92  
 DATE/TIME COMPLETED: 2/4/92  
 TECH: *for 220*  
 COMMENTS: *for 2230*  
 29:12 25 92

☒ 06 CBC AUTO OFF  
☐ 07 MANUAL OFF  
☐ 05 HGB HCT  
 PRE-OP ☐ SIAT ☒  
 TIMED \_\_\_\_\_ AM \_\_\_\_\_ PM

CLASS NO: 66 B  
 LAB NO: ROUTINE HEMATOLOGY

TEST NO: 10473


10473  
 LOHAN, JOURDEAN  
 038 10 15  
 033Y

8227  
 1 87 88

CHART COPY

SEG	EOS	3	PROMYLO	CORR WBC
BAND	1	BASO	BLAST	PLAT SUFE
LYMPH	30	META	REAC LYMPH	NORM RBC MORPH
MONO	5	MYELO	NRBC/100	

00247-25/141

\* 

MICRO	HYP	BASO STIP	SPHERO
MACRO	OVAL	POLY	RBC MORPH
ANISO	POIK	FRAGS	1 + SL 2 + MOD 3 + MK

URINALYSIS

☐ ASAP  
☐ ROUTINE  
☐ PRE-OP  
☐ SPECIAL TIME  
☒ STAT

DATE TO BE DONE: 2/4/92  
 TICKET BY: SM  
 ORDERED BY: *for*  
 DR. *for*

☐ URINALYSIS  
☐ VOIDED  
☒ CLEAN CATCH  
☐ CATH

#2-049  
 GLU  
 BIL  
 KET  
 SG  
 BLO  
 PH  
 PRO  
 URO  
 NIT  
 LEU

02-04-00  
 NEGATIVE  
 NEGATIVE  
 NEGATIVE  
 <=1.005  
 NEGATIVE  
 5.0  
 NEGATIVE  
 0.2 E.U./dL  
 NEGATIVE  
 NEGATIVE

GLU - NEGATIVE  
 BIL - NEGATIVE  
 KET - NEGATIVE  
 SG - 1.002 - 1.030  
 BLO - NEGATIVE  
 PH - 5.0 - 9.0  
 PRO - NEGATIVE  
 URO - 0.2 - 1.0 E.U./dL  
 NIT - NEGATIVE  
 LEU - NEGATIVE

29:12 25 92

CLINTEST  
 ICTOTEST  
 KETOSTIX  
 SULFOSAL  
 UROBILISTIX  
 EHRlich UNITS/DL URINE  
 UROBILINOGEN  
 NORMAL (0.1-1.0 Eu/dl)  
☒ MICRO: NOT INDICATED  
 Color: *yellow*  
 Appearance: *clear*  
☐ MICROSCOPIC  
 Casts: \_\_\_\_\_ /LPF  
 WBC: \_\_\_\_\_ /HPF  
 RBC: \_\_\_\_\_ /HPF  
 Crystals  
 Epithelial Cells  
 Yeast  
 Bacteria  
 Mucus  
 Amorphous

OF SECOND

BENCE JONES PROTEIN *for 220*  
 TECH: *mm* DATE: 2/4/92 TIME: *RP* PATH:

PATIENT CHART



LabCorp Raritan  
69 First Avenue, Raritan, NJ 08869-0000

Phone: 908-526-2400

SPECIMEN	TYPE	PRIMARY LAB	REPORT STATUS	Page #:
275-306-4524-0	S	RN	COMPLETE	1

#### ADDITIONAL INFORMATION

FASTING: N  
CCU:0305821902 H-00109476 PHONE: 302-225-0540 DOB: 1/27/1959

PATIENT NAME	SEX	AGE(YR./MOS.)
JOURDEAN, LORAH S	F	48 / 8

PT. ADD.: 114 WALLS AVE  
WILMINGTON DE 19805-0000

DATE OF COLLECTION TIME	DATE RECEIVED	DATE REPORTED	TIME	
10/02/2007 12:51	10/03/2007	10/03/2007	11:15	3695

#### CLINICAL INFORMATION

RA CD-10029449214

PHYSICIAN ID.	NPI	PATIENT ID.
NASH A	1043323900	467510

ACCOUNT: Millcreek Medical Associates

4512 Kirkwood Hwy  
Wilmington DE 19808-0000

ACCOUNT NUMBER: 07519612

TEST	RESULT	LIMITS	LAB
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#### Drug Scrn, Treatment Center

Amphetamines Screen, Urine	Negative	ng/mL	Cutoff= 1000	01
Barbiturates Screen, Urine	Negative	ng/mL	Cutoff= 200	01
Benzodiazepines Screen, Urine	Negative	ng/mL	Cutoff= 300	01
Cannabinoids Screen, Urine	Negative	ng/mL	Cutoff= 50	01
Cocaine (Metab.) Screen, Urine	Negative	ng/mL	Cutoff= 300	01
Opiates Screen, Urine	Negative	ng/mL	Cutoff= 300	01
Phencyclidine Screen, Urine	Negative	ng/mL	Cutoff= 25	01
Methadone Screen, Urine	Negative	ng/mL	Cutoff= 300	01
Propoxyphene Screen, Urine	Negative	ng/mL	Cutoff= 300	01

#### Drug Screen Comment:

This assay provides a preliminary unconfirmed analytical test result that may be suitable for the clinical management of patients in certain situations. For workplace drug testing programs, preliminary positive findings should always be confirmed by an alternative method. Some over-the-counter medications, as well as adulterants, may cause inaccurate results. Screen Only testing does not meet the College of American Pathologists Forensic Urine Drug Testing Program requirements as a forensic urine drug test for workplace testing. All clients must ensure that their testing program conforms to applicable state and federal laws and employment agreements.

LAB: 01 RN	LabCorp Raritan	DIRECTOR: Irene Isaac V MD
69 First Avenue, Raritan, NJ 08869-0000		

*exph*

Pat Name: JOURDEAN, LORAH S	Pat ID: 467510	Spec #: 275-306-4524-0	Seq #: 3695
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Results are Flagged in Accordance with Age Dependent Reference Ranges

Last Page of Report

LCM Version: 03.19.01

5



**TETRA TECH, INC.**  
SURVEY WORK LOG

APPROVED: \_\_\_\_\_

RCN: 6810

PROJECT: ADMIN

DATE: JUNE 2, 2005

CHIEF: \_\_\_\_\_

ASSISTANT: LOURDEAN LORAN

TECHNICIAN: \_\_\_\_\_

HOURS	
STRAIGHT TIME	OVERTIME
<u>3.5</u>	
_____	_____
_____	_____
_____	_____
_____	_____

WORK TASK	QUANTITY COMPLETED	HOURS	
		STRAIGHT TIME	OVERTIME
<u>SURVEY WORK LOGS - ENTERED</u>		<u>3.5</u>	
<u>EMPLOYEE'S TIME INTO THE</u>			
<u>COMPUTER.</u>			
<u>QA - JOB NUMBERS WITH PROJECTS</u>			
<u>MATHCOUNTS - 2005 - RECOGNITION</u>			
<u>DINNER - FAXES, TELEPHONE CALLS.</u>			
_____			
_____			
_____			
_____			
_____			

REMARKS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6/3/05

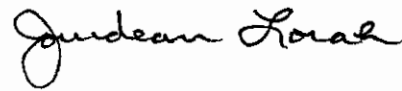
NOTE: If work performed is an "EXTRA," do a separate work log, note it is an "EXTRA," and have the work approved by the client by signing above.

Fill out separate daily logs for different crew sizes (e.g., 2 MSC, 3 MSC).

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY THAT on this day of FEB. 5, 2008, the  
following documents were either mailed or delivered to the Defendants.**

**Reed Smith  
Attention: David Wilkes  
1201 Market Street  
Suite 1500  
Wilmington, Delaware 19801**

A handwritten signature in black ink, appearing to read "Judean Lora". The signature is written in a cursive, flowing style.